

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE CHANGES, 2011

Docket No. N2012-1

**RESPONSES OF THE UNITED STATES POSTAL SERVICE WITNESS BRATTA TO
PUBLIC REPRESENTATIVE INTERROGATORIES (PR/USPS-T5-5—6(a,c,&d))**
(March 8, 2012)

United States Postal Service witness Bratta (USPS-T-5) provides responses to the above-listed interrogatories of the Public Representative dated February 23, 2012. The response to PR/USPS-T5-6(b) is forthcoming. Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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RESPONSE OF THE UNITED STATES POSTAL SERVICE WITNESS BRATTA
TO PUBLIC REPRESENTATIVE INTERROGATORIES

PR/USPS-T5-5

Please refer to USPS-LR-N2012-1/40 - Materials Responsive to PR USPS-T5-1(a), worksheet LR40.xls.

- a. Please define the acronyms used in this worksheet (such as CS, INT SQ FT, etc.), list the sources for data appearing in this worksheet, and provide a description of the data provided in this library reference.
- b. Please confirm that the file shows five different types of multi-purpose P&DCs that will remain after network realignment: District/CS, Retail, BMEU, OIG/IS, and Carrier Unit.
- [c]. Please explain the multiple functions performed at each of these 5 types of multi-purpose P&DCs.
- [d]. Please confirm that the file estimates that 2.8 percent of the square footage of P&DCs are multi-purpose facilities.
- [e]. Your response to PR/USPS-T-5-1(a), which asks you to explain how you determined that only 95 percent of Labor Distribution Codes 37 and 38 and non-personnel costs will be realized as savings, states that this worksheet contains the answer, yet it appears that 2.8 percent of remaining square P&DC footage is devoted to multi-purpose facilities. Please reconcile how the 2.8 percent figure demonstrates that 95 percent of Labor Distribution Codes 37 and 38 and non-personnel costs will be realized as savings?

RESPONSE:

a.

Acronym / Column definition:

MS-47 – Handbook used to determine cleaning requirements in all Postal facilities.

MS-1 – Handbook used to determine maintenance requirements in all Postal facilities.

Gross Bldg (MS-1) – Square footage of building as determined by guidelines of the MS-1 Handbook.

Gross Interior (MS-47) – Square footage of the interior of the building as determined by guidelines of the MS-47 Handbook.

Exterior Paved (MS-47) - Square footage of the paved/concrete exterior of the building as determined by guidelines of the MS-47 Handbook.

Exterior Unpaved (MS-47) - Square footage of the unpaved (grass) exterior of the building as determined by guidelines of the MS-47 Handbook.

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RESPONSE to PR/USPS-T5-5 (continued):

Ext.Pv-UnPv Combined (MS-47) - Square footage of the paved and unpaved (grass) exterior building as determined by guidelines of the MS-47 Handbook.

LCD36_MPE_TOT_BAS – Total authorized mail processing equipment positions in the Plant and Stations/Branches prior to Network Rationalization.

LCD37_BLDG_MAIN_TOT_BAS - Total authorized building and building equipment positions in the Plant prior to Network Rationalization.

LCD37_BLDG_STA_TOT_BAS - Total authorized building and building equipment positions in Stations/Branches prior to Network Rationalization.

LCD37_FMO_TOT_BAS - Total authorized Field Maintenance Operations positions for support of Associate Offices prior to Network Rationalization.

LCD39_MOS_TOT_BAS - Total authorized Maintenance Operations Support positions for support of the Plant, Stations/Branches, and Associate Offices prior to Network Rationalization.

LCD38_BLDSESV_MAIN_TOT_BAS - Total authorized building services (Custodial) positions in the Plant prior to Network Rationalization.

LCD38_BLDSESV_STA_TOT_BAS - Total authorized building services (Custodial) positions in Stations/Branches prior to Network Rationalization.

LCD36_MPE_TOT_PRO - Total projected mail processing equipment positions in the Plant and Stations/Branches after Network Rationalization.

LCD37_BLDG_MAIN_TOT_PRO - Total projected building and building equipment positions in the Plant after Network Rationalization.

LCD37_BLDG_STA_TOT_PRO - Total projected building and building equipment positions in Stations/Branches after Network Rationalization.

LCD37_FMO_TOT_PRO - Total projected Field Maintenance Operations positions for support of Associate Offices after Network Rationalization.

LCD39_MOS_TOT_PRO - Total projected Maintenance Operations Support positions for support of the Plant, Stations/Branches, and Associate Offices after Network Rationalization.

LCD38_BLDSESV_MAIN_TOT_PRO - - Total projected building services (Custodial) positions in the Plant after Network Rationalization.

LCD38_BLDSESV_STA_TOT_PRO - Total projected building services (Custodial) positions in Stations/Branches after Network Rationalization.

DISTRICT/CS SQ FT – Square footage of the Postal facility occupied by District and/or Customer Service operations.

RETAIL SQ FT - Square footage of the Postal facility occupied by Postal retail operations such as window services and post office boxes.

BMEU SQ FT - Square footage of the Postal facility occupied by the Bulk Mail Acceptance operations.

OIG / IS SQ FT - Square footage of the Postal facility occupied by the Office of Inspector General or Inspection Service.

CARRIER UNIT SQ FT - Square footage of the Postal facility occupied by Delivery unit.

OTHER NON MP SQ FT - Square footage of the Postal facility occupied by other non mail processing operations not listed above.

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RESPONSE to PR/USPS-T5-5 (continued):

BATHRM/CAFE/SW 10% OF TOTAL - Square footage of the Postal facility occupied by bathrooms, cafeteria's and swing rooms estimated to be 10% of the total Plant square footage.

TOTAL NON MP SQ FT - Square footage of the Postal facility occupied by all non mail processing operations

% OF PDC – The non mail processing area as a percentage of the total Plant area.

LDC 37 FTE – The authorized number of building maintenance positions based on the percentage of remaining non mail processing square footage.

\$ of LDC 37 For Remaining operations - The authorized number of building maintenance positions remaining multiplied by \$45.45 times 1760 (1 man-year).

LDC 38 FTE - The authorized number of building services (Custodial) positions based on the percentage of remaining non mail processing square footage.

\$ of LDC For Remaining operations - The authorized number of building maintenance positions remaining multiplied by \$40.38 times 1760 (1 man-year).

% of non personnel cost remaining – The percentage of area remaining as non mail processing operations multiplied by 2.

Data Source:

eMARS staffing module

USPS-LR-N2012-1/17 and 37

b-[c]. Not confirmed. The file reflects different major groups of non-mail processing operations that occupy P&DCs, and this information was used to determine the maintenance burden not attributable to mail processing operations.

The file does not reflect different mail processing facilities.

[d-e]. For purposes of my testimony and the savings estimates provided in this docket, I used a 5 percent estimate of non-mail processing operations in closing facilities. Intentionally, I applied a conservative estimate of non-mail processing operations. The worksheet contains information for non-mail processing operations at individual facilities.

RESPONSE OF THE UNITED STATES POSTAL SERVICE WITNESS BRATTA
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PR/USPS-T-5-6

Please refer to USPS-LR-N2012-1/31. In the preface you state:
“eMARS_WHEP_Staffing Changes Final_AM_v5: This document contains the base and proposed stuffing numbers for all eMARS Sites (Gaining, Study, and Other).”

- a. Please confirm that field ‘Gaining_Site_Name’ lists names of the sites that would gain staff as a result of network rationalization initiative. If not confirmed, please explain what sites are listed under this field.

- c. Please provide the definition/descriptions of sites called ‘study’ and ‘others’
- d. Please, list all sources of data provided in eMARS_WHEP_Staffing Changes Final_AM_v5

RESPONSE:

- a. Not confirmed. The field “Gaining_Site_Name” lists sites that would gain operations or volume, and gains in operations or volume does not necessarily equate to staffing gains.

- c. Sites included in the “Study” category were on the original list to be studied for closure. Sites included in the “Others” category were not gaining sites or sites studied for closure, but they may have experienced modifications to their equipment sets.
- d. Please see the response to Presiding Officer’s Information Request No. 1, Question 22.